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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MATT P. JACOBSEN,

Plaintiff,

vs.

CLEAR RECON CORP, HSBC BANK
USA N.A., PHH MORTGAGE
CORPORATION,

Defendants.

CASE NO. 3:15-cv-00504-MMD-VPC

**HSBC BANK USA, N.A.'S REQUEST
FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING
ORDER (FIRST REQUEST)**

***EXPEDITED CONSIDERATION
REQUESTED***

Defendant HSBC Bank USA, N.A. ("HSBC Bank") received Plaintiff's Ex Parte Application for Temporary Restraining Order (the "TRO Motion") on the afternoon of Monday, October 5, 2015. In the TRO Motion, Plaintiff seeks to enjoin a trustee's sale of his property scheduled for Thursday, October 8, 2015. The Court ordered defendants to respond to the TRO Motion by Wednesday, October 7, 2015, which is the day before the scheduled sale. To adequately respond to the TRO Motion, HSBC Bank requires more time to consider Plaintiff's allegations and ascertain the status of any pending request for loan modification. So that Plaintiff will not be prejudiced by this requested extension, HSBC Bank has advised the trustee, Clear Recon Corp., through its counsel, to postpone the sale for at least two weeks – to a date no sooner than October 22, 2015.

1 In light of the sale postponement, HSBC Bank requests that its deadline to respond to the
2 TRO Motion be extended until Friday, October 16, 2015. The undersigned spoke to plaintiff by
3 telephone for his position on this requested extension to respond, and he does not oppose this
4 requested extension.

5 A proposed order is submitted concurrently with this motion.

6 Dated: October 7, 2015

SNELL & WILMER L.L.P.

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8 By: /s/ Nathan G. Kanute

9 Erica J. Stutman

10 Nevada Bar No. 10794

Nathan Kanute

11 Nevada Bar No. 12413

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14 *Attorneys for HSBC BANK USA, N.A.*

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(775) 785-5440

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I electronically filed the foregoing **HSBC BANK USA, N.A.'S REQUEST FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER (FIRST REQUEST)** using the CM/ECF system which will send a notice of electronic filing to all parties as listed on the Notice of Electronic Filing.

I also caused to be served a true and correct copy of **HSBC BANK USA, N.A.'S REQUEST FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER (FIRST REQUEST)** by the method indicated:

<u> X </u>	Electronic Mail
<u> </u>	U.S. Certified Mail
<u> </u>	Facsimile Transmission
<u> </u>	Overnight Mail

and addressed to the following:

Matt P. Jacobsen
 1311 La Loma Drive
 Carson City, NV 89701
mj@annllc.com
Plaintiff in Pro Per

DATED October 7, 2015

/s/ Lara J. Taylor
 An Employee of Snell & Wilmer LLP

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USA N.A., PHH MORTGAGE
CORPORATION,

Defendants.

CASE NO. 3:15-cv-00504-MMD-VPC

**ORDER GRANTING HSBC BANK USA,
N.A.'S REQUEST FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S
MOTION FOR TEMPORARY
RESTRAINING ORDER (FIRST
REQUEST)**

This matter having come before the Court pursuant to Defendant HSBC Bank USA, N.A.'s ("HSBC Bank") Request for Extension of Time to Respond to Plaintiff's Motion for Temporary Restraining Order (First Request) filed on October 7, 2015; the Court having previously ordered HSBC Bank to respond to Plaintiff's Ex Parte Application for Temporary Restraining Order (the "TRO Motion") by Wednesday, October 7, 2015; HSBC Bank requiring more time to adequately respond to the TRO Motion; Plaintiff not being prejudiced by the requested extension; and good cause appearing to grant the extension:

IT IS HEREBY ORDERED that:

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1 1. HSBC Bank's Request for Extension of Time to Respond to Plaintiff's Motion for
2 Temporary Restraining Order (First Request) is hereby GRANTED.

3 2. HSBC Bank shall have until Friday, October 16, 2015 to file its response to the
4 TRO Motion.

5 **IT IS SO ORDERED**

6 Dated this 7th day of October 2015.

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9 UNITED STATES DISTRICT COURT JUDGE
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